

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

IN RE: VALSARTAN,  
LOSARTAN, AND IRBESARTAN  
PRODUCTS LIABILITY  
LITIGATION

HON. ROBERT B. KUGLER  
HON. JOEL SCHNEIDER

Civil No. 19-2875 (RBK/JS)

**CERTIFICATION OF  
JEFFREY W. GREENE, ESQ.**

Document filed Electronically

JEFFREY W. GREENE, ESQ., being of full age, certifies as follows:

1. I am a Shareholder of Greenberg Traurig, LLP, attorneys for Defendants Teva Pharmaceuticals USA, Inc., Teva Pharmaceutical Industries Ltd., Actavis LLC, Actavis Pharma, Inc., and Arrow Pharm (Malta) Ltd. (collectively, “Teva” or the “Teva Defendants”). I make this Certification based on personal knowledge and in support of the Teva Defendants’ letter brief regarding its request for this Court to enforce the Electronic Discovery Protocol (Dkt. 127).

2. Attached hereto as Exhibit A is a true and accurate copy of the July 1, 2020 correspondence from Teva’s counsel to Plaintiffs’ counsel.

3. Attached hereto as Exhibit B is a true and accurate copy of the July 2, 2020 correspondence from Plaintiffs’ counsel to Teva’s counsel.

4. Attached hereto as Exhibit C is a true and accurate copy of the July 4, 2020 correspondence from Teva's counsel to Plaintiffs' counsel.

5. Attached hereto as Exhibit D is a true and accurate copy of the July 6, 2020 correspondence from Teva's counsel to Plaintiffs' counsel.

6. Attached hereto as Exhibit E is a true and accurate copy of the July 10, 2020 correspondence, together with its exhibits, from Teva's counsel to Plaintiffs' counsel.

7. Attached hereto as Exhibit F is a true and accurate copy of the July 10, 2020 correspondence from Plaintiffs' counsel to Teva's counsel.

8. Attached hereto as Exhibit G is a true and accurate copy of the July 12, 2020 correspondence from Teva's counsel to Plaintiffs' counsel.

9. Attached hereto as Exhibit H is a true and accurate copy of the July 13, 2020 correspondence from Plaintiffs' counsel to Teva's counsel.

10. Attached hereto as Exhibit I is a true and accurate copy of a non-responsive document collected through the search terms from Teva's custodians.

11. Attached hereto as Exhibit J is a true and accurate copy of a non-responsive document collected through the search terms from Teva's custodians.

12. Attached hereto as Exhibit K is a true and accurate copy of a non-responsive document collected through the search terms from Teva's custodians.

13. Attached hereto as Exhibit L is a true and accurate copy of a non-responsive document collected through the search terms from Teva's custodians.

I certify under penalty of perjury that the foregoing is true and correct.

Dated: July 14, 2020

/s/Jeffrey W. Greene  
JEFFREY W. GREENE, ESQ.